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ABSTRACT

The New York State Board of Education's Division of School Safety is responsible for maintaining a safe and secure environment to ensure that schools are free from disruption. This report presents findings of an audit that investigated whether the division's incident reporting system database accurately captured all school safety incidents that occurred at board schools. The audit compared student suspension information for the last four months of 1994 from the board's Office of Student Information Services (OSIS) to the division's database to see if the division database reflected all school safety incidents that resulted in suspensions at the seven schools with the most suspensions. Findings indicate that the 1994-95 midyear report presented by the board to the public was misleading because it understated the extent of school safety incidents that actually occurred in schools. Principals reported only a small portion of the school safety incidents that resulted from student suspensions; the percentage of reported incidents ranged from 4 to 35 percent. Six recommendations are included. The board disagreed with the report's conclusion that the reporting problems were systemic. The appendix contains a list of contributors. Two figures and four tables are included. (LMI)

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State of New York
Office of the State Comptroller
Office of the State Deputy Comptroller
for the City of New York

H. Carl McCall
State Comptroller

Rosemary Scanlon
Assistant Deputy Comptroller
for the City of New York

NEW YORK CITY BOARD OF EDUCATION DIVISION OF SCHOOL SAFETY

INCIDENT REPORTING SYSTEM NEEDS TO BE STRENGTHENED TO ENSURE ACCURATE REPORTING OF SCHOOL SAFETY INCIDENTS

October 2, 1995

A-7-95

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STATE OF NEW YORK
OFFICE OF THE STATE COMPTROLLER
270 BROADWAY
NEW YORK, NEW YORK 10007

H. CARL McCALL
STATE COMPTROLLER

ROSEMARY SCARLOW
ASSISTANT DEPUTY COMPTROLLER
FOR THE CITY OF NEW YORK

October 9, 1995

Honorable Ramon C. Cortines
Chancellor
New York City Board of Education
110 Livingston Street
Brooklyn, New York 11201

Re: Final Report - New York City Board of Education, Division of School Safety, Incident Reporting System Needs To Be Strengthened to Ensure Accurate Reporting of School Safety Incidents, No. A-7-95

Dear Chancellor Cortines:

This audit was performed pursuant to the State Comptroller's authority as set forth in the State Constitution, the State Finance Law, and the General Municipal Law. Our audit focused on the adequacy of the system the Board has in place to track the number of school safety incidents.

This audit was prepared under the direction of Allen M. Vann, Audit Director. Major contributions to the report are listed in the Appendix of this report.

Office of the State Comptroller
Office of the State Deputy Comptroller
for the City of New York

CONTENTS

EXECUTIVE SUMMARY		**ES-1**
CHAPTER I.	**INTRODUCTION**	**1**
	Objectives, Scope and Methodology	2
CHAPTER II.	**NUMBER OF SCHOOL SAFETY INCIDENTS REPORTED TO PUBLIC WAS SIGNIFICANTLY UNDERSTATED**	**3**
	Board's Midyear Report Seriously Understates the Number of School Safety Incidents	3
	School Principals Did Not Always Submit Incident Reports	5
	School Safety Officers Do Not Always Report Incidents	10
	Operations Reports Prepared by the Division's Borough Offices Were Not Entered into the Division Data Base	11
	Conclusion	13
	Recommendations	13
	Agency Response and Auditor Comments	14
APPENDIX	**Major Contributors To this Report**	**16**

NEW YORK CITY BOARD OF EDUCATION
DIVISION OF SCHOOL SAFETY

INCIDENT REPORTING SYSTEM NEEDS TO BE STRENGTHENED TO ENSURE ACCURATE REPORTING OF SCHOOL SAFETY INCIDENTS

EXECUTIVE SUMMARY

PURPOSE

The purpose of this audit was to determine whether the Board of Education's Division of School Safety (Division) incident reporting system data base accurately captures all school safety incidents which occur at Board schools. Information from this data base is used by the Board to publicly report the number of incidents that have occurred at each school.

BACKGROUND

The Division is responsible for maintaining a safe and secure environment to ensure that schools are free from disruption. Its 1994-95 budget was approximately $72 million. It deploys some 3,000 school safety officers (officers) in the Board's 176 high schools, 184 middle schools, and 576 of the 651 elementary schools.

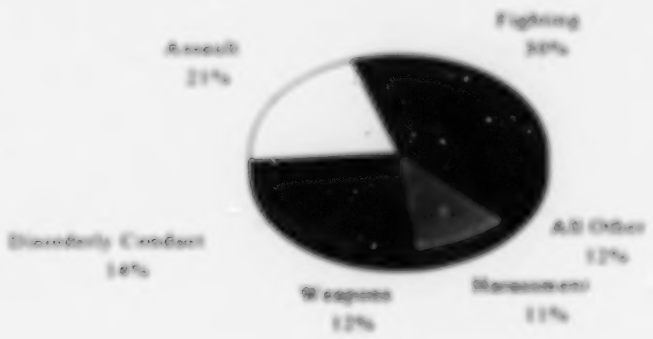
The Division utilizes a computer data base to capture the number of school safety incidents that occur at Board schools. Statistics from this data base are reported to the Chancellor and used by the Board twice a year to publicly report on school safety. In response to the Chancellor's concerns about the accuracy of the reported statistics, the Division strengthened its procedures for reporting such incidents at the start of the 1994-95 school year. The Board, relying on this new system, reported a total of 8,333 school safety incidents for the first half of school year 1994-95, an increase of 28 percent over the first half of the prior year.

On August 31, 1995, following issuance of our preliminary report, the Board reported a total of 19,814 incidents for the 1994-95 school year. In a message accompanying the release of these full year statistics, the Chancellor "cautioned that a preliminary draft of an audit conducted by the State Comptroller's Office on the reporting of school safety incidents suggests significant underreporting."

RESULTS IN BRIEF

The 1994-95 midyear report presented by the Board to the public was misleading because it understated the extent of school safety incidents actually occurring in the schools. We found that the Division's data base significantly understated the number of school safety incidents that occurred at seven sampled schools, and believe that this underreporting is indicative of a systemic problem. Our review of the seven schools found that the principals reported only a small portion of the school safety incidents that resulted from student suspensions; the percent of reported incidents ranged from 4 percent to 35 percent. A total of 429 of these school safety incidents were not reported. A breakdown by type of these incidents is shown in the chart below.

Unreported Incidents by Category
for Seven Sampled Schools



The high percentage of unreported incidents casts serious doubt about whether the Board's revised reporting system has adequately remedied past underreporting problems. Our analysis uncovered a number of reasons for the deficiencies in the data base:

- Principals did not submit reports on all school safety incidents occurring at their schools.
- The Division did not utilize a readily available data base of all student suspensions to capture information about school safety incidents.

- Many officers failed to submit required Scanning Reports for weapons which were confiscated from students at metal detection scanning sites.

- Many officers failed to telephone in a description of incidents in which they were involved.

- The Division did not enter into its data base all Operations Reports that had been telephoned in by the officers.

AGENCY RESPONSE AND AUDITOR COMMENTS

We made six recommendations aimed at improving the accuracy of the Board's school safety incident reporting system. In its response the Board indicated that it was in general agreement with our recommendations and that it has already taken steps to implement many of them.

It should be noted, however, that the Board did take issue with the methodology used to arrive at certain conclusions, as well as our interpretation of which incidents should be reported.

The Board took exception to our conclusion that the reporting problems were systemic, based on the number and choice of schools selected for detailed testing. Regarding the first issue, it should be noted that the seven schools included in our sample had 870 reported suspensions, which comprised about 8½ percent of all reported suspensions for the four-month period tested. In addition, they accounted for over 4¼ percent of the incidents reported system-wide. Similarly, our analysis of suspension and incident data for an additional 10 schools revealed that the number of reported incidents was small in relation to the number of reported suspensions. While the results of our analyses can not be statistically projected to the entire population with any degree of reliability, they do suggest that the underreporting of school safety incidents is a systemic problem. Therefore, we continue to maintain that if these schools are representative of the population of schools reporting both suspensions and incidents, that the overall school safety statistics may be substantially understated.

Regarding our interpretation of what incidents should be reported, we relied on the Division of School Safety's own definition of reportable incidents.

NEW YORK CITY BOARD OF EDUCATION
DIVISION OF SCHOOL SAFETY

INCIDENT REPORTING SYSTEM NEEDS TO BE STRENGTHENED TO ENSURE ACCURATE REPORTING OF SCHOOL SAFETY INCIDENTS

CHAPTER I. INTRODUCTION

The New York City Board of Education's Division of School Safety (Division) is responsible for maintaining a safe and secure environment to ensure that schools are free from disruption. The Division's 1994-95 budget was approximately $72 million. It deploys some 3,000 school safety officers (officers) in the Board's 176 high schools, 184 middle schools, and 576 of the 651 elementary schools. The Division is also responsible for collecting and reporting data on school safety incidents.

The Division utilizes a computer data base to capture the number of school safety incidents that occur at schools. Statistics from this data base are reported to the Chancellor and used by the Board to publicly report twice a year on school safety. The Division produces a midyear report summarizing, by school, the incidents that occurred during the first half of the school year, July 1 through December 31, and a year-end report, covering the full school year, July 1 through June 30. The Board issues these reports, which are the only measures the public has of the extent of school safety incidents in the schools. The information in the data base is mainly entered from Incident Reports, the official documents describing school safety incidents. The reports, developed by the Division as required by the Chancellor, include categories of incidents that must be reported by the school principals. These categories, as listed on the Incident Report form, are as follows:

- misconduct in school (including fighting, insubordination and disruption),
- public order offense (including riot, disorderly conduct and loitering),
- criminal mischief (including graffiti, property damage and vandalism),
- fire-related (including fire, explosion, false alarm, bomb threat and smoke conditions),
- robbery,
- weapons possession,
- controlled substances (including possession or use of illegal drugs or alcohol),
- personal injury and intimidation (including assault, harassment, menacing and reckless endangerment),
- theft,
- burglary,
- trespass,
- sexual offense,
- kidnap,
- death.

At the start of the 1994-95 school year, the Division strengthened its procedures for reporting such incidents by utilizing Operations Reports to match against Incident Reports. The Operations Reports are prepared by Division employees at five borough offices based on information telephoned in by officers. The incidents considered school safety incidents are entered into the data base. If a principal does not submit an Incident Report, the Division uses the information on the Operations Report to capture the incident.

The original 1993-94 Division statistics, based upon its old incident reporting system, produced reports that subsequently were retracted because of the Chancellor's concerns about whether principals were reporting all school safety incidents. Consequently, he requested a more accurate report and, based on the revised information, he reported to the public that 17,046 school safety incidents occurred at Board schools during 1993-94. In September 1994, a new incident reporting system was established to address the problems of the previous mechanism. The Chancellor, relying on this new system, reported a total of 8,333 school safety incidents for the first half of school year 1994-95, an increase of 28 percent over the first half of the prior year.

On August 31, 1995, following issuance of a preliminary version of this audit report, the Chancellor reported a total of 19,814 incidents for the full 1994-95 school year. In a message accompanying the release of the full year's statistics, the Chancellor "cautioned that a preliminary draft of an audit conducted by the State Comptroller's Office on the reporting of school safety incidents suggests significant underreporting."

Objectives, Scope and Methodology

The objective of this audit was to determine whether the Division's data base accurately captures all school safety incidents which occur at Board schools. We tested incidents which occurred between September 1, 1994 (when the new incident reporting system began) and December 31, 1994. We evaluated the adequacy of the methods used by the Division to obtain such school safety incident statistics. We compared student suspension information obtained from the Board's Office of Student Information Services (OSIS), to the Division's data base as of March 30, 1995, to determine if the data base reflected all school safety incidents that resulted in student suspensions at seven schools; OSIS indicated that these seven schools had reported the most suspensions during that four-month period. We used the Division's definitions as specified on its Operations/Incident reporting forms to determine which incidents should have been reported.

In addition, we selected a stratified statistical sample of Operations Reports on file at the Division's five borough offices to determine if school safety information from such reports was included in the Division's data base.

We conducted our audit in accordance with generally accepted government auditing standards. Audit fieldwork was conducted between November 1994 and August 1995.

CHAPTER II. NUMBER OF SCHOOL SAFETY INCIDENTS REPORTED TO PUBLIC WAS SIGNIFICANTLY UNDERSTATED

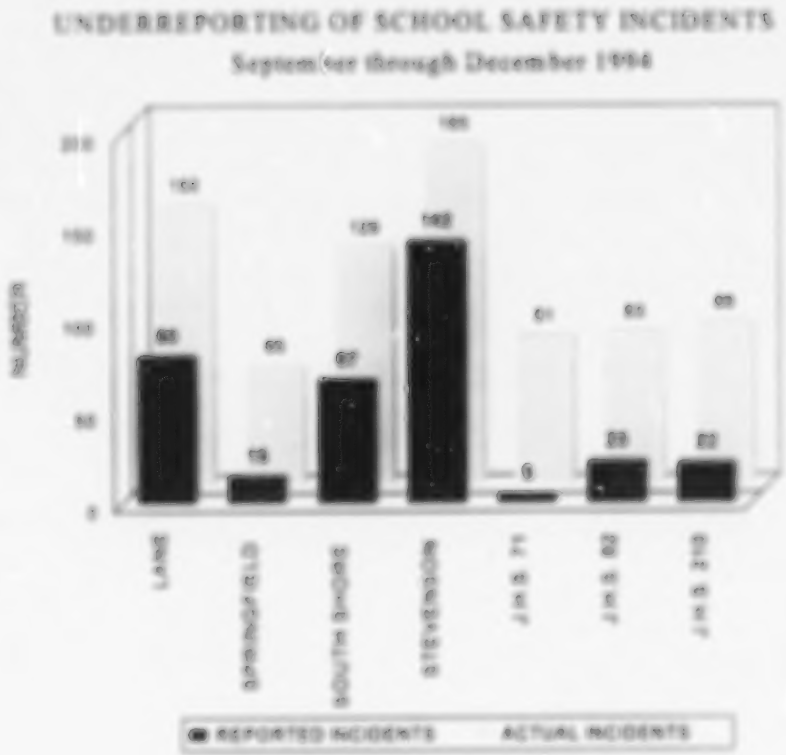
The Division's incident reporting system seriously understates the number of school safety incidents which have occurred at Board schools. Based upon our findings at seven sampled schools, we believe that the 8,333 incidents reported to the public by the Board in its 1994-95 midyear report could represent less than half the actual number if the seven schools are typical of the other schools reporting incidents. Many safety-related infractions that led to student suspensions were not in the Division's data base because school principals did not submit required Incident Reports. The Division did not utilize suspension information, available from the Board's Office of Student Information Services, to capture incidents which should have been reported. Many incidents telephoned in by school safety officers, for which Operations Reports were prepared by borough offices, were not entered into the Division data base. Officers directly involved in incidents or witness to them did not always call in descriptions to the borough offices. Also contributing to the problem of underreporting was the fact that school safety officers did not always report to the Division all weapons confiscations resulting from metal detector scanning.

Board's Midyear Report Seriously Understates the Number of School Safety Incidents

The number of incidents reported by the Division to the Chancellor and subsequently reported by the Board to the public was significantly understated. The Board's 1994-95 midyear report, released on May 19, 1995, indicated 8,333 school safety incidents had occurred. To determine whether the statistics reported by the Division were accurate we reviewed a printout received from OSIS of all student suspensions it had compiled for the 1994-95 school year, as of January 30, 1995. (This type of information was also available to the Division but was not used.) We tested the seven schools with the most reported suspensions to determine the adequacy of controls over the reporting of school safety incidents: Franklin K. Lane, Springfield Gardens, South Shore, and Adlai Stevenson High Schools, and Junior High Schools 71 (Brooklyn), 82 (Bronx), and 210 (Queens). Based upon our review of the suspension records, we determined which suspensions resulted from school safety incidents and then searched the Division's data base to determine if all such incidents were included.

The Board's midyear report included only 354 of the 783 school safety incidents that occurred at the seven schools during the period July 1, 1994 through December 31, 1994; 429 school safety incidents were omitted. Based on the Division's definition of which incidents were safety-related, the following graph compares the number of

incidents reported for each of the seven schools to the number of incidents at the schools that we believe were safety-related.



Our review disclosed that only 45 percent of the incidents known to the schools were reflected on the midyear report. If these seven schools are representative of all Board schools, the actual number of incidents might be more than double the 8,333 reported. As described in the following sections, the Division was not proactive in searching for all school safety incidents.

Chancellor's Regulation A-412 provides a guideline for the reporting of incidents. When a school incident occurs, the principal is responsible for reviewing the details to determine if it is safety-related. (Illness and accidental injury are not considered safety-related.) If it was safety-related, the principal must complete an Incident Report and mail it to the Division, where it is entered into the data base. If the incident was previously reported to the Division by an officer, an Operations Report should already be in the data base. Where no Incident Report was received from the school within two weeks of receipt of the Operations Report, the Division will request

the principal, via a "dunning letter," to submit one. If an Incident Report is still not submitted, the Division can consider the Operations Report as the official document for the incident.

Ninety-five percent of the 429 incidents were missing because the principals decided not to submit Incident Reports, apparently based upon their own interpretation of what constitutes an incident. Operations Reports were also not prepared for these incidents. The other incidents were not reported because officers at the high schools' metal detection scanning units did not always submit reports of weapons confiscated from students or visitors.

School Principals Did Not Always Submit Incident Reports

Our review of suspension records at the seven schools identified 525 school safety incidents that should have been reported. However, only 96 of these incidents (18 percent) were reported to the Division. Following consultation with Board officials and review of documentation provided by the Board in response to our preliminary report, we reduced our totals for the number of incidents that we believed to be safety-related from 535 to 525 and the number of omitted Incident Reports from 442 to 429. The principals took disciplinary actions against the students involved in the 429 unreported school safety incidents, but did not report the incidents to the Division as required. The following table shows that only a small percentage of the school safety incidents which occurred during the period September 1 through December 31, 1994 were reported to the Division:

School Name	Number of School Safety Incidents Resulting in Suspensions	Reported to and Entered into the Division of School Safety Data Base	
		Safety Incidents	Percentage
J.H.S. 210	69	3	4%
J.H.S. 71	80	4	5%
J.H.S. 82	65	5	8%
Springfield Gardens	58	8	14%
Franklin K. Lane	94	22	23%
Adlai Stevenson	64	21	33%
South Shore	95	33	35%
Total/Percentage	525	96	18%

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Following are some examples of the more serious school safety incidents which were not in the data base on March 30, 1995:

At J.H.S. 210:

> A number of students were suspended for coming to school with box cutters, razor blades, or knives. Students were also suspended for hitting one here and for fighting among themselves. There were also several incidents involving sexual harassment and assault of both students and teachers.

At J.H.S. 71:

> Students were suspended for stabbing other students. In another incident, one student choked another, leaving the victim unable to breathe for a time. Other students were suspended for defacing school property. Students were also suspended for fighting, sexual harassment, and threatening teachers with bodily harm.

At Adlai Stevenson High School:

> One student threw a desk at another. Another was found in possession of a scalpel during metal detection scanning. Many students were suspended for fighting.

At South Shore High School:

> One student was found in possession of marijuana. Other students were suspended for infractions such as hitting a teacher in the head "a couple of times," punching a paraprofessional, and assaulting an officer by striking him in the stomach several times. In response to our inquiries, a school official stated that "the student was not caught using [marijuana] or attempting to sell it, therefore no incident had occurred." Regarding the student who was suspended for hitting the teacher, the school official indicated that he believed the assault was "accidental" in nature, and therefore not reportable.

The above incidents were clear breaches of discipline, often involving violent, dangerous or threatening behavior which should have had supporting Incident Reports.

In order to determine why incidents like these were not reported to the Division, we contacted the appropriate school officials. Most of these officials' interpretations differed from the Division's definition of reportable school safety incidents. In fact, most told us that they, not the Division, should determine what is a school safety incident.

We provided the principal of J.H.S. 210 with a list of 70 school safety incidents that led to suspensions at his school. He indicated that he was "in charge of safety in [his] building" and responded in writing that he "was very distressed and extremely agitated by the fact that [the Division of] School Safety has decided to define what is an incident. . . ." He stated that "the reality is that if every fight, if every time a student asks another student for a quarter, if every threat, if every punch had to result in an incident report, all I would be doing is incident reports to the glorification of the bureaucrat who sits at 110 Livingston Street." He wrote regarding the suspension of one student for sexual harassment that "if every time a 7th or 8th grade male student requests a sexual act from a female student and that has to be an incident report, then what we [will] have across the city [is] a multiplicity of stupidity by bureaucrats."

The principal of J.H.S. 71 told us that he believed fighting is not reportable to the Division. Neither is racial or sexual harassment, although all are suspendable infractions. If an assault is "a minor thing," he would not report it but if it causes injury where a student must be taken to the hospital, it would be reported. Also, he said that if a student was suspended for threatening a teacher it might not result in an incident because he may have felt that the student was "mouthing off" and would not follow through on the threat.

The assistant principal for security of Stevenson High School stated that there is no requirement for a principal to submit an Incident Report for fighting among students. She indicated that the Division has no "power to tell the principals what is an incident."

Chancellor's Regulation A-412 requires school principals to report all incidents using a form "provided by the [Division] of School Safety." The current version of that form states that:

> "The principal or person in charge of a school must use this School Safety Form to report all incidents in school during school hours, before and after school on school property, while travelling on vehicles funded by the Board of Education, at all school sponsored events and on other than school property, when the conduct can be demonstrated to affect negatively the educational process or endanger the health, safety or morale of the school community. This includes all instances in which a crime has been committed [sic], breaches of discipline involving violent, dangerous, or threatening behavior resulting either in school administrative or law enforcement sanctions, and disturbances and activities interrupting the educational process."

Student suspensions are clearly school administrative sanctions. The Chancellor's Regulation was established to create uniformity in the reporting of school safety

incidents among the various schools. The Regulation gave the Division, not the principals, the authority to determine which incidents are reportable as safety-related.

Nevertheless, Board officials advised us that even though Chancellor's Regulation A-412 gives the Division responsibility for defining which incidents should be reported, in practice the school principals have been relying on their own judgment to determine which types of incidents should be reported. This would suggest that responsibility for the school safety reporting system is more fragmented than was intended by the Chancellor. When the Chancellor requested more accurate 1993-94 school safety incident statistics, he expressed his concern that the principals were not fully reporting all school safety incidents. In this connection, the Chancellor instructed the Division to strengthen its incident reporting process for the 1994-95 school year to ensure uniform reporting among the schools. As a result, the Division began using Operations Reports as a means of capturing school safety incidents the principals did not report. The procedural changes demonstrate that the Chancellor wanted the Division to be responsible for determining which incidents should be reported.

In fact, the Chancellor, in statements that accompanied the annual 1994-95 school safety statistics, stated that "I insisted that we add operations reports from school safety officers to the data base of incident reports, even if the principal had not filed a corresponding incident report. That meant 1,934 more reports included last year and 3,673 more reports for 1994-95." However, the Operations Reports cannot be counted on as the sole backup to insure compliance with reporting requirements. Only 13 of the 429 school safety incidents at the seven sampled schools that were not reported to the Division via Incident Reports were reported via Operations Reports. Therefore, only 13 would have eventually been captured by the Division at yearend when it determined which Operations Reports would be converted to Incident Reports for statistical purposes.

As previously noted, the Division sends principals a written reminder in cases when it has received a safety-related Operations Report but not an Incident Report from the principal. The letter expressly refers to Chancellor's Regulation A-412 when requesting the principal to submit the required Incident Report. Many principals who received these dunning letters subsequently submitted Incident Reports. This additional procedure suggests that they were well aware of the need to adhere to A-412.

We believe that the low rate of compliance with Chancellor's Regulation A-412 by the seven school principals is evidence of a systemic problem. There were schools other than the seven sampled that reported few incidents during the four-month period reviewed but many student suspensions. We compiled the list of schools below by comparing the suspension printout received from OSIS with the Board's midyear

report. While there is not a one-to-one relationship between suspensions and incidents, the differences illustrated below suggest probable underreporting of incidents. For instance, it is highly unlikely that only three of the incidents that led to 85 suspension at J.H.S. 126 were safety-related.

School Name and District	Total Suspensions	Total Incidents Reported
J.H.S. 50, District 14	99	5
I.S. 61, District 24	99	7
J.H.S. 143, District 10	93	7
J.H.S. 126, District 14	85	3
Paul Robeson High School	69	6
I.S. 227, District 20	63	11
J.H.S. 117, District 9	59	3
I.S. 302, District 19	48	8
J.H.S. 201, District 20	47	6
P.S. 238, District 21	43	5

In order to obtain explanations of why principals do not report, we provided the principals in our original sample of seven schools with listings of descriptions of the 429 school safety incidents that they did not report. In most cases, the principals claimed that the incidents were not safety-related and therefore not reportable as school safety incidents. However, they were unable to provide convincing evidence to that effect. The table below shows that most of these incidents (73 percent) resulted in suspensions for serious infractions such as fighting, harassment, assault and weapons possession, all on the official Incident Report as categories of incidents that must be reported by the principals:

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Category of Incident	Unreported Incidents	Percentage
fighting	128	30%
assault	91	21%
disorderly conduct	60	14%
weapons possession	50	12%
harassment	46	11%
theft	29	6%
vandalism	14	3%
sexual assault	9	2%
illegal substance	2	1%
Total	429	100%

The principals' explanations acknowledged that our descriptions of the infractions were accurate but they indicated that fighting, harassment and assault were not reportable as school safety incidents. One principal, in fact, responded that individual occurrences of fights, assaults, harassment, thefts and vandalism offenses were considered "unacceptable behavior," but not reportable. Another principal used injury as a criterion for the reporting of fights as school safety incidents and said that only if an injury occurred would the incident be reported. We note that no such distinction is made on the Incident Report form.

School Safety Officers Do Not Always Report Incidents

Although School Safety Officers are instructed to call into their borough office to describe every incident at their schools of which they are aware, we found that they do not always do so. Although 40 of the suspensions we reviewed resulted from incidents that directly involved officers (some where the officer was assaulted or threatened), or where officers were directly involved in the resolutions of those incidents, 29 of them were not in the Division data base as of March 30, 1995, even though all of these incidents took place before the end of 1994. The following is a breakdown of the number of incidents involving officers and the number omitted from the data base:

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School Name	Incidents Involving Officers	Operations Reports Not in Data Base	
		Number	Percentage
Franklin K. Lane High School	12	12	100%
Junior High School 210 (Queens)	1	1	100%
Springfield Gardens High School	7	6	86%
South Shore High School	13	7	54%
Adlai Stevenson High School	6	3	50%
Junior High School 82 (Bronx)	1	0	0%
Total/Percentage	**40**	**29**	**73%**

It appears doubtful that principals will file Incident Reports for incidents where no Operations Reports have been previously submitted. The assistant principal of Stevenson High School stated that "if a School Safety Officer is on the scene during a fight and calls in an Operations Report . . . , the principal will indicate if he concurs that a fight took place and submit an Incident Report." However, "if no [officer] was there, no Operations Report would be called in and no Incident Report would be submitted." In fact, for the seven sampled schools, Incident Reports were filed for less than 6 percent of school safety incidents we uncovered where no Operations Reports had been submitted.

Operations Reports Prepared by the Division's Borough Offices Were Not Entered into the Division Data Base

Many school safety incidents telephoned in by officers and transcribed on to Operations Reports by the Division's borough offices were not entered into the Division data base. Based on the results of a stratified statistical sample, we are 95 percent confident that between 897 (12 percent) and 1,729 (23 percent) of the 7,379 Operations Reports logged in from September through December 1994 were safety-related but were not in the data base as of March 30, 1995. These reports are important since they serve as a control for principals submitting Incident Reports. As stated earlier, principals do not generally submit Incident Reports unless they know that an Operations Report was previously filed.

When an incident occurs at a school, the officer on site must telephone the borough office with a description of it. Personnel at the borough office transcribe the

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description on a pre-numbered Operations Report. The category of the incident is indicated, e.g., weapons possession, burglary, fighting, assault, etc. The Operations Report number is entered into a borough log with a short description of the incident, and the report itself is filed at that office. A copy of each report should be faxed to the Operations unit at the Division central office where it is logged in and filed. A copy is faxed from the Operations unit to the Statistics unit of the central office. The Statistics unit makes a determination as to whether or not it is a school safety incident. (Operations Reports with descriptions such as "sickness" or "accidents" involving students or staff are not considered by the Division as safety incidents.) All incidents considered safety-related must then be entered into the Division data base.

We randomly selected a stratified statistical sample of 250 Operations Reports, 50 from the log books of each of the five borough offices. These reports were prepared from September 1, 1994 through the dates in December 1994 when we visited the offices. We determined that 202 of these reports were safety-related and attempted to track each from the borough office to the Division data base. We found that 39 (19 percent) of the 202 Operations Reports were not in the data base as of March 30, 1995. This indicates a serious lack of control over the input of records into the incident reporting system data base. Eleven (31 percent) of 36 safety-related Operations Reports submitted by Brooklyn were omitted. Also missing were eight (21 percent) of 38 from Manhattan, eight (19 percent) of 42 from Queens, seven (17 percent) of 41 from the Bronx and five (11 percent) of 45 from Staten Island. This indicates the need for the Division to periodically reconcile its borough office log book entries with the actual Operations Reports information in its data base.

During the course of our audit we provided the Division with preliminary information concerning the missing sampled Operations Reports. A review was made by the Division. The Assistant to the Executive Director informed us that confirmation receipts produced by the borough office fax machines provided false confidence that the Operations Reports had been successfully transmitted to the Division central office. Based upon the information we provided and the Division's internal review, the aforementioned official indicated that the Division has revised the procedures by which Operations Reports are submitted by the borough offices and entered into its data base. The revised procedures are designed to decrease the likelihood that Operations Reports for school safety incidents will be omitted from the data base. Fax machines will no longer be used to transmit Operations Reports to the Division. Those reports will be sent via courier mail directly to the Statistics unit for review and data entry. The Operations unit will no longer be involved. The Assistant to the Executive Director indicated that based on the internal review, the data base has been updated to include 313 Operations Reports received by the boroughs that the Division determined should have been entered because there were no matching Incident Reports.

Conclusion

In the Chancellor's May 19, 1995 press release that accompanied the release of the official 1994-95 midyear school safety statistics, he indicated that "much of the growth [in number of incidents] is clearly because of increasingly reliable reporting . . . ." While the revised system may have provided increased reliability, our findings at the seven schools revealed that a significant number of school safety incidents are still not reported. These findings point to the need to establish better controls which would ensure that principals properly report all school safety incidents that occurred at their schools. In fact, information that could have significantly strengthened the Division's control over the reporting of incidents (suspension data available to it from the Board's Office of Student Information Services) was not obtained.

The inaccurate accounting of school safety statistics prevents the Board from making informed decisions regarding the utilization of its limited resources. It also prevents the public from obtaining reliable information of what is really happening in the schools vis à vis safety concerns. Parents are entitled to this information because they have a right to make informed choices about which schools their children should attend. In doing so they need to feel confident that the information the Board is providing about school safety-related issues is credible.

Recommendations

The Chancellor should:

1. Issue a memorandum to all school principals restating their responsibility for reporting all school safety incidents occurring at their schools to the Division of School Safety. The memorandum should include specific guidelines and examples of school safety incidents that require Incident Reports.

The Division of School Safety should:

2. Establish a mechanism to monitor the submission of Incident Reports by principals by utilizing suspension information available from the Office of Student Information Services, as well as Operations Reports that have been filed.

3. Ensure that future reports on school safety incidents include incidents resulting in student suspensions.

4. Ensure that all Scanning Reports are submitted by the school safety officers, and that the information from these reports is entered into its data base and reconciled to suspension information.

5. Issue a memorandum reiterating the requirement that school safety officers must report all known school safety incidents so that Operations Reports can be prepared.

6. Periodically reconcile the Operations Reports in the borough officers' log books to those in the Division data base.

Agency Response and Auditor Comments

The Board indicated that it was in general agreement with all of our recommendations and that it has already taken steps to implement many of them. It should be noted, however, that the Board did take issue with the methodology used to arrive at certain conclusions, and our interpretation of which incidents should be reported. The Board's position on these two issues is presented in the latter part of this section. Following are excerpts from its response regarding the implementation of each of the six recommendations.

Regarding Recommendation 1, the Board stated that:

> Upon receipt of the Preliminary Draft Audit Report, the Chancellor wrote to all principals reminding them of the importance of reporting all school safety incidents. . . . However, more specific guidance is necessary for principals in determining exactly how severe an occurrence must be in order to qualify as a School Safety Incident. The Chancellor has initiated a process by which much more specific guidelines will be generated.

In its response to Recommendations 2 and 3, the Board stated that:

> Although we do not necessarily agree that every safety-related suspension should result in a school safety incident report, we do agree that examining suspension information is a very useful way of determining whether necessary incident reports have been filed. . . . The Chancellor has initiated a process by which suspension data will be used to augment incident information.

To implement Recommendation 4, the Board indicated that:

> The Division of School Safety has ordered that all scanning site Group Leaders be re-instructed on the reporting requirements for scanning related weapons. The Division shall reconcile all scanning reports with the Borough Commands as well as the suspension data on a monthly basis.

Regarding Recommendation 5, the Board indicated that the Division of School Safety issued an Operation Order which reiterated the requirement that School Safety Officers properly report all safety related incidents.

In response to Recommendation 6, the Board stated that:

> The system for returning operation reports has been revised to ensure all reports are received at the Statistical Unit. The Statistical Unit will do a daily review of all borough offices logs as well as a monthly reconciliation to ensure all appropriate reports are included in the data base.

The Board took exception to two issues. Board officials had concerns about the methodology used to select our sample, which consisted of the seven schools with the highest number of reported suspensions. They maintained that the results from these seven schools could not be generalized to the entire population of 1,100 schools. Board officials also contended that we created our own definition of what incidents should be reported and then tested against that definition.

Regarding the first issue, it should be noted that the seven schools included in our sample had 870 reported suspensions, which comprised about 8¼ percent of all reported suspensions for the four-month period tested but accounted for only 4¼ percent of the incidents reported. Similarly, our analysis of suspension and incident data for an additional 10 schools revealed that the number of reported incidents was small in relation to the number of reported suspensions. While the results of our analyses can not be statistically projected to the entire population with any degree of reliability, they do suggest that the issue of underreporting of school safety incidents is a systemic problem. Therefore, we continue to maintain that if these schools are representative of the population of schools reporting both suspensions and incidents, that the school safety statistics may be substantially understated.

We did not create our own definition of what incidents should be reportable by the school principals as the Board contended in its response. We relied on Chancellor's Regulation A-412 which provides the Division of School Safety with the responsibility for defining which incidents should be reported. In this connection, we utilized the Division's detailed definition of a reportable incident from its incident reporting form, which contains many categories of reportable incidents and provides specific instructions regarding the type of incidents that should be reported.

APPENDIX

MAJOR CONTRIBUTORS TO THIS REPORT

Allen M. Vann, Director

Stanley Evans, Audit Manager
Michael Solomon, Audit Supervisor
Stuart Dolgon, Auditor-in-Charge
Ira Lipper, Staff Auditor
Joan Williams, Staff Auditor